

HON. JAMAL N. WHITEHEAD

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

VALVE CORPORATION,
Plaintiff,
v.
LEIGH ROTHSCHILD, ROTHSCHILD
BROADCAST DISTRIBUTION SYSTEM
LLC, DISPLAY TECHNOLOGIES, LLC,
PATENT ASSET MANAGEMENT, LLC,
MEYLER LEGAL, PLLC, AND SAMUEL
MEYLER,
Defendants.

Case No. 2:23-cv-1016

**DECLARATION OF DARIO A.
MACHELEIDT IN SUPPORT OF
PLAINTIFF VALVE CORPORATION'S
OPPOSITION TO MERCHANT &
GOULD'S MOTION FOR LEAVE TO
WITHDRAW**

**NOTE ON MOTION CALENDAR:
June 3, 2025**

Complaint Filed: 07/07/2023

1 I, Dario A. Machleidt, declare as follows:

2 1. I am an attorney duly licensed to practice law in the State of Washington and am
3 admitted to this Court. I am a lawyer in the law firm of Kilpatrick Townsend & Stockton LLP,
4 counsel for Plaintiff Valve Corporation in the above-referenced action.

5 2. I have personal knowledge of the facts stated in this declaration and, if called upon
6 to do so, I could and would competently testify thereto.

7 3. Attached hereto as **Exhibit 1** is a true and correct copy of an email Don McPhail
8 sent to Valve's counsel on April 4, 2024.

9 4. Attached hereto as **Exhibit 2** is a true and correct copy of an excerpt of the case
10 docket for the case captioned *American Pacific Mortgage Corp. et al. v. Everett Financial Inc. et*
11 *al.*, No. 2:21-cv-01088 (W.D. Wash.).

12 5. Attached hereto as **Exhibit 3** is a true and correct copy of a letter I sent to Defense
13 counsel on May 27, 2025.

14 6. Attached hereto as **Exhibit 4** is a true and correct copy of an email chain among the
15 parties relating to discovery disputes. The most recent email in the chain comes from me and is
16 dated May 22, 2025.

17 7. Attached hereto as **Exhibit 5** is a true and correct copy of an email chain among the
18 parties relating to discovery disputes. The most recent email in the chain comes from Eric Chad
19 and is dated May 21, 2025.

20 8. Attached hereto as **Exhibit 6** is a true and correct copy of a letter I sent to Defense
21 counsel on May 11, 2025.

22 9. Attached hereto as **Exhibit 7** is a true and correct copy of a Docket Navigator
23 printout associating nine Analytical Technologies, LLC cases (where PAM is the parent company)
24 with Mr. McPhail.

25 10. When Defendants' productions are filtered to exclude public information and are
26 limited to documents obtained from Defendants' custodians, their production totals 787
27 documents consisting of 9,352 total pages.

1 11. Attached hereto as **Exhibit 8** is a true and correct copy of Symbology Innovations,
2 LLC v. Valve Corp., No. 2:23-CV-00419-JRG, 2025 WL 364075 (E.D. Tex. Jan. 31, 2025).

3 I declare under penalty of perjury under the laws of the United States of America that the
4 foregoing is true and correct.

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6 Executed on May 28, 2025 at Seattle, Washington.

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/s/ Dario A. Machleidt _____

Dario A. Machleidt

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MACHLEIDT DECL. ISO VALVE'S
OPP. TO MOT. TO WITHDRAW
CASE NO. 2:23-CV-1016

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